NASA Plan

For Reviewing and Reducing

Personally Identifiable Information (PII)

And

Eliminating Unnecessary Use of

Social Security Numbers (SSNs)

Document Change and Review History

Version Number	Summary of Changes	Changes Made/Reviewed By	Date
1.0	Initial	Patti Stockman	12/17/07
2.0	Revised for FY09	Teresa Fryer	08/25/08

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1.   Purpose

As required by the Privacy Act and Office of Management and Budget (OMB) Memorandum M-07-16, the National Aeronautics and Space Administration (NASA) is required to: 1) review all current Personally Identifiable Information (PII) holdings and ensure such holdings are accurate, relevant, timely, and complete; and 2) reduce current PII holdings to the minimum necessary for the proper performance of the documented NASA function.

This plan provides for ongoing identification, review, and reduction of NASA holdings of PII as defined in NASA Procedural Requirement (NPR) 1382.1 to assure that only the minimum PII holdings needed for NASA operations and administration are retained. Implementation of the plan will assure that PII collected and maintained by NASA is only that which is relevant and necessary to accomplish a purpose of the Agency, as required by statute or Executive Order of the President as specified in NPR 1382.1. This document also includes NASA's plan for eliminating unnecessary use of Social Security Numbers (SSNs).

In addition to meeting the OMB requirements, NASA's objective is to reduce the risk to the Agency as a whole as well as to NASA personnel and the members of the public who interact with the Agency. The reduced PII holdings and elimination of SSNs where not mandatory will help minimize the risk of a PII breach and its potential harm to individuals, such as identity theft. The PII holdings review requirement is not limited to information systems but includes PII holdings such as electronic records on removable storage media and individual workstations or in hard copy or microfilm files.

2.   Applicability

This plan is applicable to NASA Headquarters and Centers, including Component Facilities and Technical and Service Support Centers. To the extent specified in their respective contracts or agreements, it applies to the NASA Jet Propulsion Laboratory, other contractors, grant recipients, or parties to agreements, to the extent that they maintain PII, including SSNs, on NASA's behalf.

3.   References

a. OMB M-07-16, Safeguarding Against and Responding to the Breach of Personally Identifiable Information, May 22, 2007

b. OMB M-08-19, FY 2008 Reporting Instructions for the Federal Information Security Management Act (FISMA) and Agency Privacy Management, July 14, 2008

c. NASA Procedural Directive (NPD) 1382.17, NASA Privacy Policy

d. NPR 1382.1, NASA Privacy Procedural Requirements

e. NASA Standard Operating Procedure (SOP) ITS-SOP-0046, Review and Reducing Personally Identifiable Information (PII)

4.   Requirement

4.1   Review and Reduction of PII

The objectives of the annual review and reduction of PII plan at NASA are to identify current data sources containing PII, review the use of SSN and other PII to reduce its collection and storage, recommend modifications to business processes and operations to protect PII, and increase employee awareness of PII issues, policies, and procedures.

4.1.1   Current Accomplishments

The following summarizes the actions to date that NASA has accomplished toward the objectives of this annual review and reduction of PII plan:

a. FY 2006 Accomplishments. In 2006, the Privacy Act Officer, coordinating with each of the Center's Privacy Act Managers (PAMs), compiled details of the types of PII used throughout the Agency, the data sources that contain PII, the uses and dissemination of PII, and the methods used to store and safeguard PII.   This was used as the initial baseline inventory of NASA systems and applications containing PII.

b. FY 2007 Accomplishments. During 2007, the Agency refined and revalidated its PII holdings inventory. The information collected was further analyzed to identify opportunities and plans for reducing PII holdings to include where specific uses and collection of the SSN could be reduced or eliminated.

c. FY 2008 Accomplishments. For 2008, the Agency placed its focus on the review of information systems that contain PII and reducing the collection and storage of PII. The results of this analysis were published in the NASA FY 2008 PII Review and Reduction report.

4.1.2   Plan and Schedule for Annual Review and Reduction of PII

NASA expects to further reduce the Agency's PII holdings annually, both electronic and non-electronic forms, and the unnecessary use of SSN using the periodic review process as identified in this plan.   This section sets forth NASA's plan for ongoing annual reviews to further validate PII holdings and reductions.

a. In the beginning of the second quarter of each fiscal year, the Center PAM will task owners of systems, applications, or other data holdings which contain PII to conduct a review and reduction analysis, following the PII Review and Reduction SOP. These procedures will be detailed in the PII Review and Reduction SOP which will elaborate steps for the annual review and data elements to be reported.

b. During the second quarter of each fiscal year, owners of systems, applications, or other data holdings which contain PII will complete the annual PII review and reduction analysis and provide their results to the Center PAM as requested.

c. No later than April 30th of each year, Center PAMs will analyze the responses from the owners of systems, applications, or other data holdings which contain PII and consolidate

results into a report to the NASA Privacy Program Manager as detailed in the PII review and reduction SOP.

d. No later than July 1st of each year, the NASA Privacy Program Manager will review each Center's report, drafting the Agency annual PII review and reduction report.

4.2 Plan and Schedule for Eliminating Unnecessary Use of SSNs

It is NASA's objective to maximize the protection of SSNs when their use is required and eliminate their use when they are not necessary. It is for this reason that NPD 1382.17 specifies that SSNs not be used unless mandated by external requirements. The NPD further requires that system owners whose systems contain SSNs work with the Office of the Chief Information Officer (CIO) to develop a plan for switching to other Agency specific identifiers. The Agency is required to convert from use of SSNs in NASA administration and operations to use of NASA's Universal Uniform Personal Identification Code (UUPIC).

4.2.1 Current Accomplishments

The following summarizes the actions to date that NASA has accomplished toward the objectives of eliminating the unnecessary use of SSNs:

a. FY2007 Accomplishments. Recognizing a national increase in incidents involving Government-held PII, including SSNs, the NASA OCIO initiated an effort in May 2007 to build upon Agency data gathered in response to OMB's December 5, 2006 action to survey Agency processes utilizing SSNs. The May activity required NASA organizations to review their holdings of SSNs with the objective of eliminating their unnecessary use.

b. FY2008 Accomplishments. During 2008, the Agency refined and revalidated its holdings of SSN inventory. System owners were required to: 1) justify and document their use of SSNs if not able to replace them with the NASA UUPIC, 2) provide a date when the system would be converted to the NASA UUPIC, or 3) provide a date when the system would be decommissioned. The information collected was further analyzed to identify opportunities and plans where specific uses and collection of the SSN could be reduced or eliminated. The results of this analysis were published in the NASA FY 2008 PII Review and Reduction report.

4.2.2 Plan and Schedule for Eliminating the Unnecessary use of SSN

As required by OMB Memorandum 07-16, Federal agencies must establish a plan in which the agency will eliminate the unnecessary collection and use of social security numbers within eighteen months. The information provided by the 2007 and 2008 review has enabled NASA to set solid goals for eliminating the unnecessary use and collection of SSNs in information systems, reports, forms, etc. This section sets forth NASA's plan for the elimination of the unnecessary use of SSNs:

a. Information Systems. Follow-up with Information System Owners to ensure a timeline has been established for: 1) the conversion of SSN to UUPIC in the nine systems identified for SSN elimination, 2) the decommissioning of the 16 systems identified for decommissioning in FY09 and FY10, and 3) determining feasibility of consolidation for the 27 systems that were identified as potential candidates for consolidation.

b. <u>Identify use of SSN on forms.</u>

<u>New forms</u>. A review will be conducted of any new forms requiring the collection of SSN, ensuring justification for its use and indicate if SSN can be truncated or masked or replaced by UUPIC. The Paperwork Reduction Act requires Federal agencies to obtain approval from OMB prior to collecting information from ten or more members of the public. Information collection forms that meet this criterion must be approved by OMB. Some information collections are governed by additional requirements, such as the Privacy Act and E-Government Act. Reviewing all forms associated with information collection pertaining to the system in question will assist in confirming that the information collection is in compliance with laws and best practices.

<u>Existing forms</u>. All existing forms that require the collection of SSN will be reviewed to ensure justification for its use and if SSN can be truncated or masked or replaced by UUPIC. Where use of the SSN is not justified, the owner of the form will prepare a plan, to include milestones and a timeline, for the elimination of SSN usage.

c. <u>Securing Use of Necessary SSN</u>. NASA will pursue additional security measures to protect holdings of SSNs where their use cannot be eliminated due to justifiable requirements.

<u>Existing System Review</u>. For those information systems that currently collect, use, maintain and/or disseminate SSN, an Initial Privacy Threshold Analysis (IPTA) will be conducted which identifies the reason the SSN is needed. If an IPTA already exists for the system, then the program will ensure there is an additional explanation regarding the need for the SSN. The IPTA will be reviewed to ensure that the need to collect, use, maintain, and/or disseminate the SSN is required by statute or regulation and/or is pursuant to a specific authorized purpose.

<u>New System Development</u>. Prior to the development of a program that seeks to collect, use, maintain, and/or disseminate SSN, the program will prepare an IPTA which identifies the reason the SSN is needed. The IPTA will be reviewed to ensure that the need to collect, use, maintain, and/or disseminate the SSN is required by statute or regulation and/or determine whether collection is authorized for a specific purpose.

<u>System Controls</u>. Sufficient security controls must be implemented in order to mitigate the risk of inappropriate or unauthorized disclosure of data containing SSN. Any access to SSNs shall be restricted with an appropriate application of security controls. Information System Owners of applications with justification for maintaining SSNs will identify actions they have already taken or will take to provide additional protection of data. Such actions will include suppressing visibility of SSNs, masking SSNs where visible, maintaining audit logs tracking the access to SSNs, etc.

d. <u>Verification and Maintenance (annually thereafter)</u>. Review of the use of SSN in electronic and non-electronic form and verification that the continued use is still required will be conducted during the annual Review and Reduction of PII analysis.

e. <u>Training and Awareness</u>. Internal communication to staff within NASA on how to identify and reduce the usage of the SSN will be developed as appropriate.

<u>Employee Reminders.</u> Notices will be sent to all NASA employees reminding them of their responsibilities regarding the use of SSN and to eliminate unnecessary use of SSN in forms such as leave and training forms.

<u>System Developers.</u> Notices will be sent to system developers and programmers to re-evaluate the use of SSN in existing applications. Guidance will be provided on masking or blocking SSN display on reports and computer screens.

5.   Responsibilities

a. The NASA SAOP shall:

- Ensure the development, publication, and update of the NASA plan and schedule for reviewing and reducing Agency-held PII and eliminating unnecessary use of SSNs.

- Make publicly available the annual NASA PII review and reduction report.

b. The NASA Privacy Program Manager shall:

- Develop, publish, and update the PII Review and Reduction Standard Operating Procedures (SOP) to conduct annual reviews and provide implementation processes and procedures.

- Implement the schedule included in this plan for updating the review and reduction of NASA PII holdings.

- Provide progress updates on the annual PII review and reduction analysis to the NASA Senior Agency Official for Privacy (SAOP).

- Draft the Agency's annual PII review and reduction report no later than July 1st of each year for reporting to OMB as required.

- Provide follow-up actions to the appropriate Center PAMs through the Center CIOs to ensure actions are completed for those areas where PII holdings can be reduced as indicated in the PII review and reduction report.

- Develop employee notices regarding the use of SSN and eliminating the unnecessary use in electronic and non-electronic form.

c. Center and Mission Directorate CIOs, through the Center PAMs, shall implement this plan.
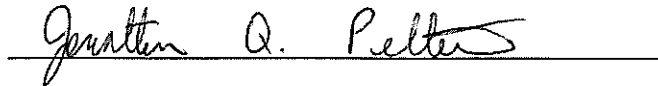
d. The Center PAMs shall:

- Conduct the annual PII review and reduction analysis at their Centers during the second quarter of each fiscal year in accordance with this plan and the PII Review and Reduction SOP.
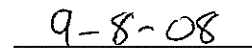
- No later than April 30th of each year provides annual PII review and reduction consolidated results to the NASA Privacy Program Manager.

- Review IPTAs to ensure that the need to collect, use, maintain, and/or disseminate the SSN is required by statute or regulation and/or is pursuant to a specific authorized purpose.

- In coordination with the Center Forms Manager, conduct a review of new and existing Center forms that use SSN, ensuring justification for its use and indicate if SSN can be truncated or masked or replaced by UUPIC.

e. Owners of systems, applications, or other data holdings which contain PII shall conduct, at the direction of the Center PAM, the PII review and reduction analysis in accordance with this plan and the PII Review and Reduction SOP.

6.   Approval

Jonathan Q. Pettus   9-8-08

Jonathan Q. Pettus   Date
Chief Information Officer and
Senior Agency Official for Privacy